

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 3447



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION  
SEP 17 2018

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September 17, 2018

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *DC* for PCO  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser *KDR*/Ben Holly *BH*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Reason To Believe Recommendation –  
2018 July Quarterly Report for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2018 July Quarterly Report in accordance with 52 U.S.C. § 30104(a). The July Quarterly Report was due on July 15, 2018.

The committees listed on the attached RTB Circulation Report either failed to file the report, filed the report no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties

for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

An explanation of the civil money penalty calculation for the following committee that filed the report is outlined below:

The committee (AF 3473) represents a candidate that participated in the 2018 Primary in Pennsylvania. The committee was required to file a 12 Day Pre-Primary Report covering April 1, 2018 through April 25, 2018 as well as a 2018 July Quarterly Report (Q2) covering April 26, 2018 through June 30, 2018. The committee filed the Q2 on July 31, 2018 covering April 1, 2018 through June 30, 2018. In order to determine the civil money penalty, we have excluded the 12 Day Pre-Primary Report activity which is linked to AF 3406.

#### **Recommendation**

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

Federal Election Commission  
Reason to Believe Circulation Report  
2018 JULY QUARTERLY Not Election Sensitive 07/15/2018 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3447	C00636365	ACTION COALITION PAC		JOANNE RICE	\$1,292,088	0		Not Filed	\$430,695 (est)	\$12,758
3448	C00471169	ALEXION PHARMACEUTICALS INC. PAC		DOUG BARRY	\$185,237	0	7/24/2018	9	\$29,457	\$526
3449	C00623256	AMERICA COMES FIRST PAC		DAVID W. SCHAMENS	\$154,404	4		Not Filed	\$154,404 (est)	\$15,594
3450	C00664763	ANGIE CHIRINO FOR CONGRESS	ANGIE CHIRINO	JORGE MIRABENT	\$111,420	0	7/25/2018	10	\$73,944	\$1,496
3451	C00658062	BRAYDEN FOR OUR FUTURE	BRAYDEN OLSON	ANDY LO	\$215,361	0		Not Filed	\$71,787 (est)	\$3,828
3452	C00649962	CAROLE CHENEY FOR CONGRESS	CAROLE CHENEY	HOLLY JOY	\$698,366	0		Not Filed	\$174,592 (est)	\$7,797
3453	C00633693	COMMITTEE TO ELECT CHUCK BOYCE	HENRY CHARLES BOYCE, JR.	WILLIAM SMITH	\$759,424	0	8/3/2018	19	\$4,641	\$148
3454	C00663104	COMMITTEE TO ELECT HP	HAMID PARVIZIAN	DOUNIA METOURI	\$213,822	0		Not Filed	\$106,911 (est)	\$6,380
3455	C00381517	DEMOCRATIC ADVANCEMENT PAC		THOMAS A. CRAMER	\$194,664	0	8/1/2018	17	\$80,409	\$2,981
3456	C00634543	DR KATHIE ALLEN FOR CONGRESS	KATHRYN ALLEN	CHRISTOPHER STOUT	\$1,728,929	0		Not Filed	\$286,155 (est)	\$11,341
3457	C00675009	EPLEY FOR CONGRESS	JAMES EPLEY	JAMES EPLEY	\$193,332	0		Not Filed	\$193,332 (est)	\$7,797
3458	C00606970	EUGENE FOR CONGRESS	EUGENE YU	ERIC YU	\$103,806	1	8/23/2018	39 (Not Filed*)	\$40,864	\$1,500
3459	C00618033	GRASSROOTS AWARENESS PAC		OFFICE OF TREASURER	\$2,353,115	0		Not Filed	\$784,372 (est)	\$15,594
3460	C00638825	JON POWELL FOR CONGRESS	JONATHAN A. POWELL	DOUG BLANCHARD	\$167,705	0		Not Filed	\$33,541 (est)	\$1,200
3461	C00663211	MAD DOG PAC		PAUL C. BALASSA	\$1,070,446	0	9/14/2018	61 (Not Filed*)	\$445,247	\$12,758
3462	C00668129	MORGAN DUNN FOR CONGRESS	MORGAN DUNN	CHRIS DUNN	\$222,816	0	7/22/2018	7	\$34,194	\$472
3463	C00634873	NEILL FOR ILLINOIS	MOHAMMAD NEILL	ANDREW NALL	\$420,980	0		Not Filed	\$70,163 (est)	\$3,828
3464	C00630400	OUR ATLANTIC CITY		TIMOTHY MANCUSO	\$423,344	0	8/8/2018	24	\$3,846	\$178
3465	C00563874	PEZZULLO FOR SENATOR	RICHARD J. PEZZULLO	NATHAN DAVIDSON	\$232,946	0	8/13/2018	29	\$105,397	\$6,012
3466	C00663880	PRINGLE FOR CONGRESS	DAVID PRINGLE	DAVID TYKULSKER	\$114,558	0		Not Filed	\$114,558 (est)	\$6,380
3467	C00640516	PROTECT OUR FUTURE		BONNIE ONEIL	\$1,954,247	0		Not Filed	\$651,416 (est)	\$14,885
3468	C00657775	RHEA FOR REPUBLICAN RENEWAL	BILL RHEA	BILL RHEA	\$207,299	0	8/15/2018	31 (Not Filed*)	\$6,832	\$400
3469	C00654640	RICK KENNEDY FOR CONGRESS	RICHARD KENNEDY	KENNEDY	\$153,709	0	7/24/2018	9	\$23,907	\$196
3470	C00640755	ROZA CALDERON FOR CONGRESS 2018	ROZA I. CALDERON	MICHAEL WILLIAMS	\$129,499	0		Not Filed	\$32,375 (est)	\$1,200
3471	C00637728	SCOTT SALMON FOR CONGRESS	SCOTT SALMON	JARED LINDENBERG	\$155,145	0	8/11/2018	27	\$3,968	\$196

9/17/2018 1:06 PM

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3472	C00589440	SHEPHERD FOR CONGRESS	DOUG SHEPHERD	DOUG SHEPHERD	\$283,426	0		Not Filed	\$56,685 (est)	\$3,828
3473	C00649947	SOLOMON FOR CONGRESS	ROBERT SOLOMON	ROBERT CHARLES SOLOMON	\$560,780	0	7/31/2018	16	\$191,969	\$4,527
3474	C00656215	TIM GOMES FOR CONGRESS	TIM GOMES	JENNIFER MAY	\$2,430,365	0		Not Filed	\$810,122 (est)	\$15,594
3475	C00649368	TIM RICH FOR CONGRESS	TIMOTHY A. RICH	TIMOTHY A. RICH	\$136,614	0		Not Filed	\$45,538 (est)	\$1,200
3476	C00629881	TO ELECT JENNY MARSHALL	JENNIFER MARSHALL	MONICA A. VALLIER	\$234,551	0		Not Filed	\$39,092 (est)	\$1,200
3477	C00653675	TOM CAMPBELL FOR NORTH DAKOTA	TOM CAMPBELL	TOM CAMPBELL	\$2,224,737	0		Not Filed	\$741,579 (est)	\$14,885
3478	C00574681	VOTER EDUCATION		ANN MATTSON	\$576,734	0		Not Filed	\$192,245 (est)	\$7,797
3478	C00638601	ZORDANI FOR CONGRESS	JENNIFER ZORDANI	JULIE NOWAK	\$221,687	0		Not Filed	\$55,422 (est)	\$3,828

\* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.



Federal Election Commission  
Certification for Administrative Fines  
September 21, 2018

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NEILL FOR ILLINOIS, and NALL, AF# 3463  
ANDREW as treasurer;  
OUR ATLANTIC CITY, and TIMOTHY ) AF# 3464  
MANCUSO as treasurer; )  
PEZZULLO FOR SENATOR, and, ) AF# 3465  
NATHAN DAVIDSON as treasurer; )  
PRINGLE FOR CONGRESS, and ) AF# 3466  
TYKULSKER, DAVID as treasurer; )  
PROTECT OUR FUTURE, and ONEIL, ) AF# 3467  
BONNIE as treasurer; )  
RHEA FOR REPUBLICAN RENEWAL, ) AF# 3468  
and RHEA, BILL as treasurer; )  
RICK KENNEDY FOR CONGRESS, and ) AF# 3469  
KENNEDY, RICHARD as treasurer; )  
ROZA CALDERON FOR CONGRESS ) AF# 3470  
2018, and WILIAMS, MICHAEL as )  
treasurer; )  
SCOTT SALMON FOR CONGRESS, and ) AF# 3471  
LINDENBERG, JARED as treasurer; )  
SHEPHERD FOR CONGRESS, and ) AF# 3472  
SHEPHERD, DOUG as treasurer; )  
SOLOMON FOR CONGRESS, and ) AF# 3473  
SOLOMON, ROBERT CHARLES DR. as )  
treasurer; )  
TIM GOMES FOR CONGRESS, and ) AF# 3474  
MAY, JENNIFER as treasurer; )  
TIM RICH FOR CONGRESS, and RICH, ) AF# 3475  
TIMOTHY A as treasurer; )  
TO ELECT JENNY MARSHALL, and ) AF# 3476  
VALLIER, MONICA A as treasurer; )  
TOM CAMPBELL FOR NORTH ) AF# 3477  
DAKOTA, and CAMPBELL, TOM as )  
treasurer; )  
VOTER EDUCATION, and MATTSON, ) AF# 3478  
ANN as treasurer; )  
ZORDANI FOR CONGRESS, and ) AF# 3479  
NOWAK, JULIE as treasurer; )

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on September 21, 2018 the Commission took the following actions on the Withdrawal and Resubmission of Reason To Believe Recommendation - 2018 July Quarterly Report for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated September 17, 2018, on the following committees:

AF#3447 Decided by a vote of 4-0 to: (1) find reason to believe that ACTION COALITION PAC, and RICE, JOANNE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3448 Decided by a vote of 4-0 to: (1) find reason to believe that ALEXION PHARMACEUTICALS INC. PAC, and BARRY, DOUG in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3449 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3450 Decided by a vote of 4-0 to: (1) find reason to believe that ANGIE CHIRINO FOR CONGRESS, and MIRABENT, JORGE MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.



AF#3451 Decided by a vote of 4-0 to: (1) find reason to believe that BRAYDEN FOR OUR FUTURE, and LO, ANDY in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3452 Decided by a vote of 4-0 to: (1) find reason to believe that CAROLE CHENEY FOR CONGRESS, and JOY, HOLLY in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3453 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT CHUCK BOYCE, and WILLIAM SMITH in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3454 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT HP, and METOURI, DOUNIA in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3455 Decided by a vote of 4-0 to: (1) find reason to believe that DEMOCRATIC ADVANCEMENT PAC, and THOMAS A. CRAMER in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3456 Decided by a vote of 4-0 to: (1) find reason to believe that DR KATHIE ALLEN FOR CONGRESS, and STOUT, CHRISTOPHER in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3457 Decided by a vote of 4-0 to: (1) find reason to believe that EPLEY FOR CONGRESS, and EPLEY, JAMES in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the

amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3458 Decided by a vote of 4-0 to: (1) find reason to believe that EUGENE FOR CONGRESS, and YU, ERIC MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3460 Decided by a vote of 4-0 to: (1) find reason to believe that JON POWELL FOR CONGRESS, and DOUG BLANCHARD in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3461 Decided by a vote of 4-0 to: (1) find reason to believe that MAD DOG PAC, and BALASSA, PAUL C in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3462 Decided by a vote of 4-0 to: (1) find reason to believe that MORGAN DUNN FOR CONGRESS, and DUNN, CHRIS in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3463 Decided by a vote of 4-0 to: (1) find reason to believe that NEILL FOR ILLINOIS, and NALL, ANDREW in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3464 Decided by a vote of 4-0 to: (1) find reason to believe that OUR ATLANTIC CITY, and TIMOTHY MANCUSO in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3465 Decided by a vote of 4-0 to: (1) find reason to believe that PEZZULLO FOR SENATOR, and NATHAN DAVIDSON in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money

penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3466 Decided by a vote of 4-0 to: (1) find reason to believe that PRINGLE FOR CONGRESS, and TYKULSKER, DAVID in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3467 Decided by a vote of 4-0 to: (1) find reason to believe that PROTECT OUR FUTURE, and ONEIL, BONNIE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3468 Decided by a vote of 4-0 to: (1) find reason to believe that RHEA FOR REPUBLICAN RENEWAL, and RHEA, BILL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3469 Decided by a vote of 4-0 to: (1) find reason to believe that RICK KENNEDY FOR CONGRESS, and KENNEDY, RICHARD in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3470 Decided by a vote of 4-0 to: (1) find reason to believe that ROZA CALDERON FOR CONGRESS 2018, and WILLIAMS, MICHAEL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3471 Decided by a vote of 4-0 to: (1) find reason to believe that SCOTT SALMON FOR CONGRESS, and LINDENBERG, JARED in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3472 Decided by a vote of 4-0 to: (1) find reason to believe that SHEPHERD FOR CONGRESS, and SHEPHERD, DOUG in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3473 Decided by a vote of 4-0 to: (1) find reason to believe that SOLOMON FOR CONGRESS, and SOLOMON, ROBERT CHARLES DR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3474 Decided by a vote of 4-0 to: (1) find reason to believe that TIM GOMES FOR CONGRESS, and MAY, JENNIFER in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3475 Decided by a vote of 4-0 to: (1) find reason to believe that TIM RICH FOR CONGRESS, and RICH, TIMOTHY A in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3476 Decided by a vote of 4-0 to: (1) find reason to believe that TO ELECT JENNY MARSHALL, and VALLIER, MONICA A in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3477 Decided by a vote of 4-0 to: (1) find reason to believe that TOM CAMPBELL FOR NORTH DAKOTA, and CAMPBELL, TOM in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3478 Decided by a vote of 4-0 to: (1) find reason to believe that VOTER EDUCATION, and MATTSON, ANN in her official capacity as treasurer violated 52

Federal Election Commission  
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September 21, 2018

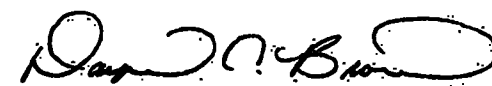
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U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3479 Decided by a vote of 4-0 to (1) find reason to believe that ZORDANI FOR CONGRESS, and NOWAK, JULIE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

September 24, 2018  
Date



Dayna C. Brown  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 24, 2018

Joanne Rice, in official capacity as Treasurer  
Action Coalition PAC  
706 North 129th St, Suite 100  
Omaha, NE 68154

C00636365  
AF#: 3447

Dear Ms. Rice:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a July Quarterly Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period April 1, 2018 through June 30, 2018, shall be filed no later than July 15, 2018. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On September 21, 2018, the FEC found that there is reason to believe ("RTB") that Action Coalition PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before July 15, 2018. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$12,758. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$12,758 is due within forty (40) days of the finding, or by October 31, 2018, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$430,695  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

- 1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 1050 First Street, NE, Washington, DC 20002. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or October 31, 2018. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances, that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Action Coalition PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

**5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

*Carole C. Hunter*

Caroline C. Hunter  
Chair



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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$12,758 for the 2018 July Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](http://www.fec.gov/af/pay.shtml) to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

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FOR: Action Coalition PAC

FEC ID#: C00636365

AF#: 3447

PAYMENT DUE DATE: October 31, 2018

PAYMENT AMOUNT DUE: \$12,758



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2019 AUG 28 11:05:52

August 28, 2019

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *KDR BH*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
2018 July Quarterly Report

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2018 July Quarterly Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, fourteen (14) committees disclosed a level of activity after the RTB finding, which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Action Coalition PAC (AF 3447) filed the 2018 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money

penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$316,839 (previously estimated to be \$430,695), thus the fine would be lowered from \$12,758 to \$11,341.

Brayden For Our Future (AF 3451) disclosed no activity after the RTB finding (previously estimated to be \$71,787), which would result in no civil money penalty (fine previously assessed to be \$3,828).

Carole Cheney for Congress (AF 3452) filed the 2018 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$624 (previously estimated to be \$174,592), thus the fine would be lowered from \$7,797 to \$333.

Dr Kathie Allen for Congress (AF 3456) filed the 2018 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$1,615 (previously estimated to be \$288,155), thus the fine would be lowered from \$11,341 to \$333.

Epley for Congress (AF 3457) filed a Form 99 (Miscellaneous Text Submission) after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$15,229 (previously estimated to be \$193,332), thus the fine would be lowered from \$7,797 to \$667.

Grassroots Awareness PAC (AF 3459) filed the 2018 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$9,909 (previously estimated to be \$784,372), thus the fine would be lowered from \$15,594 to \$400.

Pringle for Congress (AF 3466) filed a Form 99 (Miscellaneous Text Submission) after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$8,195 (previously estimated to be \$114,558), thus the fine would be lowered from \$6,380 to \$400.

Protect Our Future (AF 3467) filed the 2018 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$182,337 (previously estimated to be \$651,416), thus the fine would be lowered from \$14,885 to \$7,797.

Shepherd for Congress (AF 3472) disclosed no activity after the RTB finding (previously estimated to be \$56,685), which would result in no civil money penalty (fine previously assessed to be \$3,828).

Tim Gomes for Congress (AF 3474) disclosed no activity after the RTB finding (previously estimated to be \$810,122), which would result in no civil money penalty (fine previously assessed to be \$15,594).

To Elect Jenny Marshall (AF 3476) filed a Miscellaneous Document and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$24,977 (previously estimated to be \$39,092), thus the fine would be lowered from \$1,200 to \$667.

Tom Campbell for North Dakota (AF 3477) filed a Form 99 (Miscellaneous Text Submission) after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$48,661 (previously estimated to be \$741,579), thus the fine would be lowered from \$14,885 to \$1,200.

Voter Education (AF 3478) filed the 2018 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$38,875 (previously estimated to be \$192,245), thus the fine would be lowered from \$7,797 to \$1,200.

Zordani for Congress (AF 3479) disclosed no activity after the RTB finding (previously estimated to be \$55,422), which would result in no civil money penalty (fine previously assessed to be \$3,828).

For your information, eight (8) committees disclosed a change in treasurer after the RTB finding. An overview of these cases has been provided below.

Action Coalition PAC (AF 3447) filed an Amended Statement of Organization after the RTB finding designating Pam Mattson as Treasurer.

Dr Kathie Allen for Congress (AF 3456) filed an Amended Statement of Organization after the RTB finding designating Kathryn Allen as Treasurer.

Grassroots Awareness PAC (AF 3459) filed an Amended Statement of Organization after the RTB finding designating Pam Mattson as Treasurer.

Mad Dog PAC (AF 3461) filed an Amended Statement of Organization after the RTB finding designating Claude Taylor as Treasurer.

Pringle for Congress (AF 3466) filed an Amended Statement of Organization after the RTB finding designating David Pringle as Treasurer.

Protect Our Future (AF 3467) filed an Amended Statement of Organization after the RTB finding designating Pam Mattson as Treasurer.

To Elect Jenny Marshall (AF 3476) filed an Amended Statement of Organization after the RTB finding designating Jennifer Marshall as Treasurer.

Voter Education (AF 3478) filed an Amended Statement of Organization after the RTB finding designating Pam Mattson as Treasurer.

# CONCLUSION

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.**
- (2) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.**
- (3) Send the appropriate letters.**

8/28/2018 9:57 AM

Federal Election Commission  
FD Circulation Report Fine Paid  
2018 JULY QUARTERLY Not Election Sensitive 07/15/2018 H\_S\_P\_UNAUTH

AP#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
3448	ALEXION PHARMACEUTICALS INC. PAC		C00471188	DOUG BARRY	07/24/2018	9	\$29,457	0	09/21/2018	\$526	\$526	11/01/2018	\$526
3453	COMMITTEE TO ELECT CHUCK BOYCE	HENRY CHARLES "CHUCK" BOYCE JR.	C00633693	WILLIAM SMITH	09/03/2018	19	\$4,641	0	09/21/2018	\$148	\$148	10/29/2018	\$148
3456	DR KATHIE ALLEN FOR CONGRESS	KATHRYN ALLEN	C00634543	KATHRYN ALLEN	11/16/2018	Not Filed*	\$1,615	0	09/21/2018	\$11,341	\$333	03/20/2019	\$333
3481	MAD DOG PAC		C00693211	CLAUDE TAYLOR	09/14/2018	Not Filed*	\$445,247	0	09/21/2018	\$12,758	\$12,758	12/21/2018	\$12,758
3482	MORGAN DUNN FOR CONGRESS	MORGAN DUNN	C00698128	CHRIS DUNN	07/22/2018	7	\$34,194	0	09/21/2018	\$472	\$472	10/04/2018	\$472
3484	OUR ATLANTIC CITY		C00630400	TIMOTHY MANCUSO	08/09/2018	24	\$3,846	0	09/21/2018	\$178	\$178	10/23/2018	\$178
3485	PEZZULLO FOR SENATOR	RICHARD J. PEZZULLO	C00663874	NATHAN DAVIDSON	08/13/2018	28	\$105,397	0	09/21/2018	\$6,012	\$6,012	11/01/2018	\$6,012
3488	RHEA FOR REPUBLICAN RENEWAL	BILL RHEA	C00657775	BILL RHEA	08/15/2018	Not Filed*	\$6,632	0	09/21/2018	\$400	\$400	10/02/2018	\$400
3469	RICK KENNEDY FOR CONGRESS	RICHARD KENNEDY	C00654640	RICHARD KENNEDY	07/24/2018	9	\$23,907	0	09/21/2018	\$196	\$196	10/31/2018	\$196

\* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

8/28/2019 9:54 AM

Federal Election Commission  
FD Circulation Report Fine Not Paid  
2018 JULY QUARTERLY Not Election Sensitive 07/15/2018 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LQA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
3447	ACTION COALITION PAC		C00635385	PAM MATTSON	02/12/2018	Not Filed*	\$316,839	0	09/21/2018	\$12,758	340	\$11,341
3449	AMERICA COMES FIRST PAC		C00623256	DAVID W. SCHAMENS		Not Filed	\$154,404 (est)	4	09/21/2018	\$15,594	340	\$15,594
3450	ANGIE CHIRINO FOR CONGRESS	ANGIE CHIRINO	C00664763	JORGE MIRABENT	07/25/2018	10	\$73,944	0	09/21/2018	\$1,496	340	\$1,496
3451	BRAYDEN FOR OUR FUTURE	BRAYDEN OLSON	C00658062	ANDY LO	4/9/2018	Not Filed*	\$0	0	09/21/2018	\$3,828	340	NONE
3452	CAROLE CHENEY FOR CONGRESS	CAROLE CHENEY	C00648982	HOLLY JOY	10/31/2018	Not Filed*	\$624	0	09/21/2018	\$7,797	340	\$333
3454	COMMITTEE TO ELECT HP	HAMID PARVIZIAN	C00683104	DOUNIA METOURI		Not Filed	\$106,911 (est)	0	09/21/2018	\$6,380	340	\$6,380
3457	EPLY FOR CONGRESS	JAMES EPLY	C00675009	JAMES EPLY		Not Filed	\$15,229	0	09/21/2018	\$7,797	340	\$987
3458	EUGENE FOR CONGRESS	EUGENE YU	C00606970	ERIC YU	08/23/2018	Not Filed*	\$40,864	1	09/21/2018	\$1,500	340	\$1,500
3459	GRASSROOTS AWARENESS PAC		C00618033	PAM MATTSON	03/29/2018	Not Filed*	\$9,909	0	09/21/2018	\$15,594	340	\$400
3466	PRINGLE FOR CONGRESS	DAVID PRINGLE	C00683680	DAVID PRINGLE		Not Filed	\$8,195	0	09/21/2018	\$9,380	340	\$400
3467	PROTECT OUR FUTURE		C00640516	PAM MATTSON	02/13/2019	Not Filed*	\$182,337	0	09/21/2018	\$14,885	340	\$7,797
3470	ROZA CALDERON FOR CONGRESS 2018	ROZA I. CALDERON	C00640755	MICHAEL WILLIAMS		Not Filed	\$32,375 (est)	0	09/21/2018	\$1,200	340	\$1,200
3472	SHEPHERD FOR CONGRESS	DOUG SHEPHERD	C00589440	DOUG SHEPHERD	11/28/2018	Not Filed*	\$0	0	09/21/2018	\$3,828	340	NONE
3473	SOLOMON FOR CONGRESS	ROBERT SOLOMON	C00649947	ROBERT CHARLES SOLOMON	07/31/2018	16	\$191,989	0	09/21/2018	\$4,527	340	\$4,527
3474	TIM GOMES FOR CONGRESS	TIM GOMES	C00656215	JENNIFER MAY	10/04/2018	Not Filed*	\$0	0	09/21/2018	\$15,594	340	NONE
3475	TIM RICH FOR CONGRESS	TIMOTHY A. RICH	C00646368	TIMOTHY A. RICH		Not Filed	\$45,538 (est)	0	09/21/2018	\$1,200	340	\$1,200
3476	TO ELECT JENNY MARSHALL	JENNIFER MARSHALL	C00628881	JENNIFER MARSHALL		Not Filed	\$24,977	0	09/21/2018	\$1,200	340	\$687
3477	TOM CAMPBELL FOR NORTH DAKOTA	TOM CAMPBELL	C00653675	TOM CAMPBELL		Not Filed	\$48,681	0	09/21/2018	\$14,885	340	\$1,200
3478	VOTER EDUCATION		C00574881	PAM MATTSON	02/13/2019	Not Filed*	\$38,875	0	09/21/2018	\$7,797	340	\$1,200
3479	ZORDANI FOR CONGRESS	JENNIFER ZORDANI	C00638601	JULIE NOWAK	10/15/2018	Not Filed*	\$0	0	09/21/2018	\$3,828	340	NONE

\* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fine Program - Final )  
Determination Recommendation for the )  
2018 July Quarterly Report: )  
ACTION COALITION PAC, and ) AF# 3447  
MATTSON, PAM as treasurer; )  
ALEXION PHARMACEUTICALS INC. ) AF# 3448  
PAC, and BARRY, DOUG as treasurer; )  
AMERICA COMES FIRST PAC, and ) AF# 3449  
SCHAMENS, DAVID W MR. as treasurer; )  
ANGIE CHIRINO FOR CONGRESS, and ) AF# 3450  
MIRABENT, JORGE MR. as treasurer; )  
BRAYDEN FOR OUR FUTURE, and LO, ) AF# 3451  
ANDY as treasurer; )  
CAROLE CHENEY FOR CONGRESS, ) AF# 3452  
and JOY, HOLLY as treasurer; )  
COMMITTEE TO ELECT CHUCK ) AF# 3453  
BOYCE, and WILLIAM SMITH as )  
treasurer; )  
COMMITTEE TO ELECT HP, and ) AF# 3454  
METOURI, DOUNIA as treasurer; )  
DR KATHIE ALLEN FOR CONGRESS, ) AF# 3456  
and ALLEN, KATHRYN DR. as treasurer; )  
EPLEY FOR CONGRESS, and EPLEY, ) AF# 3457  
JAMES as treasurer; )  
EUGENE FOR CONGRESS, and YU, ) AF# 3458  
ERIC MR. as treasurer; )  
GRASSROOTS AWARENESS PAC, and ) AF# 3459  
MATTSON, PAM as treasurer; )  
MAD DOG PAC, and TAYLOR, CLAUDE ) AF# 3461  
as treasurer; )  
MORGAN DUNN FOR CONGRESS, and ) AF# 3462  
DUNN, CHRIS as treasurer; )  
OUR ATLANTIC CITY, and TIMOTHY ) AF# 3464  
MANCUSO as treasurer; )  
PEZZULLO FOR SENATOR, and ) AF# 3465  
NATHAN DAVIDSON as treasurer; )  
PRINGLE FOR CONGRESS, and ) AF# 3466  
PRINGLE, DAVID as treasurer; )  
PROTECT OUR FUTURE, and ) AF# 3467  
MATTSON, PAM as treasurer; )



RHEA FOR REPUBLICAN RENEWAL,	)	AF# 3468
and RHEA, BILL as treasurer;	)	
RICK KENNEDY FOR CONGRESS, and	)	AF# 3469
KENNEDY, RICHARD as treasurer;	)	
ROZA CALDERON FOR CONGRESS	)	AF# 3470
2018, and WILLIAMS, MICHAEL as	)	
treasurer;	)	
SHEPHERD FOR CONGRESS, and	)	AF# 3472
SHEPHERD, DOUG as treasurer;	)	
SOLOMON FOR CONGRESS, and	)	AF# 3473
SOLOMON, ROBERT CHARLES DR. as	)	
treasurer;	)	
TIM GOMES FOR CONGRESS, and	)	AF# 3474
MAY, JENNIFER as treasurer;	)	
TIM RICH FOR CONGRESS, and RICH,	)	AF# 3475
TIMOTHY A as treasurer;	)	
TO ELECT JENNY MARSHALL, and	)	AF# 3476
MARSHALL, JENNIFER as treasurer;	)	
TOM CAMPBELL FOR NORTH	)	AF# 3477
DAKOTA, and CAMPBELL, TOM as	)	
treasurer;	)	
VOTER EDUCATION, and MATTSON,	)	AF# 3478
PAM as treasurer;	)	
ZORDANI FOR CONGRESS, and	)	AF# 3479
NOWAK, JULIE as treasurer;	)	

#### CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on August 30, 2019 the Commission took the following actions on the Administrative Fine Program - Final Determination Recommendation for the 2018 July Quarterly Report as recommended in the Reports Analysis Division's Memorandum dated August 28, 2019, on the following committees:

AF#3447 Decided by a vote of 4-0 to: (1) make a final determination that ACTION COALITION PAC, and MATTSON, PAM in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3448 Decided by a vote of 4-0 to: (1) make a final determination that ALEXION PHARMACEUTICALS INC. PAC, and BARRY, DOUG in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3449 Decided by a vote of 4-0 to: (1) make a final determination that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3450 Decided by a vote of 4-0 to: (1) make a final determination that ANGIE CHIRINO FOR CONGRESS, and MIRABENT, JORGE MR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3451 Decided by a vote of 4-0 to: (1) make a final determination that BRAYDEN FOR OUR FUTURE, and LO, ANDY in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3452 Decided by a vote of 4-0 to: (1) make a final determination that CAROLE CHENEY FOR CONGRESS, and JOY, HOLLY in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3453 Decided by a vote of 4-0 to: (1) make a final determination that COMMITTEE TO ELECT CHUCK BOYCE, and WILLIAM SMITH in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3454 Decided by a vote of 4-0 to: (1) make a final determination that COMMITTEE TO ELECT HP, and METOURI, DOUNIA in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3456 Decided by a vote of 4-0 to: (1) make a final determination that DR KATHIE ALLEN FOR CONGRESS, and ALLEN, KATHRYN DR. in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3457 Decided by a vote of 4-0 to: (1) make a final determination that EPLEY FOR CONGRESS, and EPLEY, JAMES in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3458 Decided by a vote of 4-0 to: (1) make a final determination that EUGENE FOR CONGRESS, and YU, ERIC MR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3459 Decided by a vote of 4-0 to: (1) make a final determination that GRASSROOTS AWARENESS PAC, and MATTSON, PAM in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3461 Decided by a vote of 4-0 to: (1) make a final determination that MAD DOG PAC, and TAYLOR, CLAUDE in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3462 Decided by a vote of 4-0 to: (1) make a final determination that MORGAN DUNN FOR CONGRESS, and DUNN, CHRIS in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3464 Decided by a vote of 4-0 to: (1) make a final determination that OUR ATLANTIC CITY, and TIMOTHY MANCUSO in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3465 Decided by a vote of 4-0 to: (1) make a final determination that PEZZULLO FOR SENATOR, and NATHAN DAVIDSON in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3466 Decided by a vote of 4-0 to: (1) make a final determination that PRINGLE FOR CONGRESS, and PRINGLE, DAVID in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3467 Decided by a vote of 4-0 to: (1) make a final determination that PROTECT OUR FUTURE, and MATTSO, PAM in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3468 Decided by a vote of 4-0 to: (1) make a final determination that RHEA FOR REPUBLICAN RENEWAL, and RHEA, BILL in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3469 Decided by a vote of 4-0 to: (1) make a final determination that RICK KENNEDY FOR CONGRESS, and KENNEDY, RICHARD in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3470 Decided by a vote of 4-0 to: (1) make a final determination that ROZA CALDERON FOR CONGRESS 2018, and WILLIAMS, MICHAEL in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3472 Decided by a vote of 4-0 to: (1) make a final determination that SHEPHERD FOR CONGRESS, and SHEPHERD, DOUG in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3473 Decided by a vote of 4-0 to: (1) make a final determination that SOLOMON FOR CONGRESS, and SOLOMON, ROBERT CHARLES DR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3474 Decided by a vote of 4-0 to: (1) make a final determination that TIM GOMES FOR CONGRESS, and MAY, JENNIFER in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3475 Decided by a vote of 4-0 to: (1) make a final determination that TIM RICH FOR CONGRESS, and RICH, TIMOTHY A in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3476 Decided by a vote of 4-0 to: (1) make a final determination that TO ELECT JENNY MARSHALL, and MARSHALL, JENNIFER in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3477 Decided by a vote of 4-0 to: (1) make a final determination that TOM CAMPBELL FOR NORTH DAKOTA, and CAMPBELL, TOM in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3478 Decided by a vote of 4-0 to: (1) make a final determination that VOTER EDUCATION, and MATTSON, PAM in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

AF#3479 Decided by a vote of 4-0 to: (1) make a final determination that ZORDANI FOR CONGRESS, and NOWAK, JULIE in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Petersen, and Walther voted affirmatively for the decision.

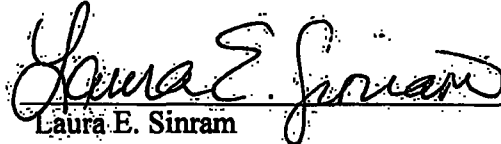
Federal Election Commission  
Certification for Administrative Fines  
August 30, 2019

Page 7

Attest:

9/4/19

Date



Laura E. Sinram

Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 29, 2019

Pam Mattson, in official capacity as Treasurer  
Action Coalition PAC  
P.O. Box 1792  
Gilbert, AZ 85299

C00636365  
AF#: 3447

Dear Ms. Mattson:

On September 21, 2018, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Action Coalition PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2018 July Quarterly Report. By letter dated September 24, 2018, the Commission notified you of the RTB finding and the preliminary civil money penalty calculated at the RTB stage to be \$12,758 in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the FEC's RTB finding, you were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. Since that time, the amount of the civil money penalty has been changed to reflect the actual level of activity of the 2018 July Quarterly Report. The FEC made a final determination on August 29, 2019 that Action Coalition PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$11,341 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$316,839

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purposes of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

**1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within thirty (30) days of receipt of this letter, to the U.S. District Court for the district in which the

committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within thirty (30) days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within five (5) days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

## **3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the civil money penalty, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

## **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

### **4. Partial Payments**

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

### **5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money

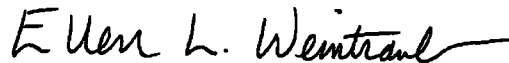


order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Ben Holly at Federal Election Commission, 1050 First St., NE, Washington, DC 20002, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in black ink that reads "Ellen L. Weintraub" with a stylized flourish at the end.

Ellen L. Weintraub  
Chair

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## **ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$11,341 for the 2018 July Quarterly Report. The payment is due within 30 days of receipt of this letter.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](http://www.fec.gov/af/pay.shtml) to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
PO Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

### **PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

### **PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

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FOR: Action Coalition PAC

FEC ID#: C00636365

AF#: 3447

PAYMENT AMOUNT DUE: \$11,341

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3447

**100000000**